# DEC 2 7 2000

#### **SECTION 6**

#### 6 510(k) SUMMARY

K001499

Prepared May 1, 2000

**Product Name:** 

Computed imaging device

**Current Trade Name:** 

PhorMax Eagle Scanner System

Manufacturer:

PhorMax Corporation

2650 East Bayshore Road Palo Alto, California 94303

Generic Name:

Computed Imaging System

Classification Name:

**MQB** 

**Contact Person:** 

Sheila W. Pickering Ph.D.

2081 Longden Circle

Los Altos, California 94024

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# 6.1 Legally Marketed Predicate Device

The PhorMax Eagle Scanner System (PESS) device is substantially equivalent to the following predicate devices with regard to device features and specifications, as well as intended use.

**Table 6.1 Predicate Devices** 

Reference	Sponsor	Predicate Device	510(k)
Number			Number
1	Lumisys, Inc.	Lumiscan 135 Phosphor Pate Digitizer	K980809
2	Bayer Corporation, Agfa Division	ADC Compact Agfa Diagnostic Center	K974597
3	Bayer Corporation, Agfa Division	ADC 70	K904519

#### 6.2 **Device Description**

The system consists of a (1) personal computer, (2) custom software for control, scanning and image formation, (3) an electronic device (scanner) for converting the image to a digital format on the (4) imaging plate enabled by phosphor technology (P/T) which is contained in a (5) cassette-like case. The cassette and plate are designed with a format and size compatible with existing x-ray systems. In use, the imaging plate (enclosed

within the cassette) is exposed to x-rays, using procedures and equipment presently being used on a routine basis for film-based x-ray imaging. The cassette and plate are placed into the scanner and the plate is removed from the cassette, read by the scanner, and returned to the cassette. The scanner converts the image data to a digital format and sends the image data to the PC, where it is converted to a DICOM 3.0 format and saved for subsequent image display.

#### 6.3 Indications for Use

The device is intended to provide diagnostic quality images for aid in physician diagnosis. This is used in the x-ray imaging modality, mainly in Chest, Skeleton and Gastro-intestinal imaging applications.

### 6.4 Substantial Equivalence

The following tables show the basis for substantial equivalence.

Table 6.2 Substantial Equivalence Comparison

	Predicate Devices		Submission Device	SE
Name	Lumiscan 135	ADC Diagnostic	PhorMax Eagle	
	Phosphor Plate	Center	Scanner System	
	Digitizer			
Intended Use	The device is a laser	To provide	To provide	Yes
	phosphor plate	diagnostic quality	diagnostic quality	
	digitizer designed to	images for aid in	images for aid in	
	read recorded patient	physician diagnosis.	physician diagnosis.	
	radiation patterns in	This is used in the x-	This is used in the x-	
	the plate and a	ray imaging	ray imaging	*
	digitized eraser system	modality, mainly in	modality, mainly in	
	to prepare the plate for	Chest, Skeleton and	Chest, Skeleton and	
	re-use.	Gastro-intestinal	Gastro-intestinal	
		imaging applications	imaging	
· •	:		applications.	
Intended Users	Radiologists,	Radiologists,	Radiologists,	Yes
	radiology technicians	radiology technicians	radiology technicians	
Intended site of	Radiology	Radiology	Clinical and	Yes
use	departments	departments	Radiology sites	
User Interface	User input, manual,	User input, manual,	User input, manual,	Yes
	graphical	graphical, or cassette	graphical	
Outputs	N/S	N/S	DICOM 3.0 file	Yes
Imaging plates	Agfa	Agfa	Agfa	
Safety Features	N/S	N/S	IEC 60101-1, IEC	Yes
			60101-2 and ANSI	
			Z136.1	

N/S = not specified in product labeling

# 6.5 Performance Data

The PhorMax Eagle Scanner System was tested for conformance to the technical specifications. Performance testing was based on FDA "Guidance for the Content of Premarket Submissions for Software Contained in Medical Devices" and FDA "Guidance for the Submission of 510(k)'s for Solid State Imaging Devices", August 6, 1999.



Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

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PhorMax Corporation c/o Sheila W. Pickering, Ph.D. Regulatory Affairs Consultants 2081 Longden Circle Los Altos, CA 94024 Re: K001499

PhorMax Eagle Scanner System Dated: November 21, 2000 Received: November 21, 2000

Regulatory class: II

21 CFR 892.1630/Procode: 90 MQB

Dear Dr. Pickering:

We have reviewed your Section 510(k) notification of intent to market the device referenced above and we have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (Premarket Approval), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 895. A substantially equivalent determination assumes compliance with the Current Good Manufacturing Practice requirements, as set forth in the Quality System Regulation (QS) for Medical Devices: General regulation (21 CFR Part 820) and that, through periodic QS inspections, the Food and Drug Administration (FDA) will verify such assumptions. Failure to comply with the GMP regulation may result in regulatory action. In addition, FDA may publish further announcements concerning your device in the Federal Register. Please note: this response to your premarket notification submission does not affect any obligation you might have under sections 531 through 542 of the Act for devices under the Electronic Product Radiation Control provisions, or other Federal laws or regulations.

This letter will allow you to begin marketing your device as described in your 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4639. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its internet address "http://www.fda.gov/cdrh/dsma/dsmamain.html".

Sincerely yours,

Daniel G. Schultz, M.D.

Captain, USPHS

Acting Director, Division of Reproductive, Abdominal, and Radiological Devices

Office of Device Evaluation

Center for Devices and Radiological Health

Division of Reproductive, Abdominal, ENT,

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(Division Sign-Off)

and Radiological Devices